

UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW
JERSEY

**COMBINED FEE APPLICATION COVER SHEET FOR THE
PERIOD JULY 1, 2023 AUGUST 11, 2023 AND FOR EXPENSES
FOR THE PERIOD MAY 1, 2023 THROUGH MAY 31, 2023**

Debtor: LTL Management LLC Applicant: Molo Lamken LLP
Case No.: 23-12825 (MBK) Client: Official Comm. of Talc
Claimants
Chapter: 11 Case Filed: April 4, 2023

SECTION I.A
FEES JULY 1, 2023
THROUGH
AUGUST 11, 2023

☒ Monthly Fee Application No. 4 or ☐ Interim Fee Application No. or ☐ Final Fee Application

Summary of Amounts Requested for the Period from July 1, 2023 through August 11, 2023

Total Fees: \$243,618.50
Total Disbursements: \$0.00
Minus 20% holdback of Fees: \$48,723.70
Total Amount Sought To Be Paid at this Time: \$194,894.80

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ¹	FEE
1. Jeffrey A. Lamken	Partner 1991	42.9	\$1,750	\$75,075.00
2. Lucas Walker	Partner 2010	1.5	\$1,100	\$1,650.00
3. Rayiner I. Hashem	Partner 2015	137.2	\$975	\$133,770.00
4. Eugene Sokoloff	Counsel 2013	9.3	\$995	\$9,253.50
5. Nathaniel Rubin	Associate 2019	28.6	\$775	\$22,165.00
6. Catherine Martinez	Associate 2020	2.2	\$775	\$1,705.00
TOTALS		221.7		\$243,618.50

Fee Totals: \$243,618.50

Disbursements Totals: \$0.00

¹ Rates in this statement reflect the rates disclosed in MoloLamken's Retention Application [Dkt. 542].

Total Fee Application: \$243,618.50

**SECTION I.B
EXPENSES MAY 1,
THROUGH
MAY 31, 2023**

Summary of New Amounts Requested for the Period from May 1, 2023 through May 31, 2023

Total Fees:	\$0.00
Total Disbursements:	\$14,688.26
Minus 20% holdback of Fees:	\$0.00
Total Amount Sought To Be Paid at this Time:	\$14,688.26

Fee Totals:	<u>\$0.00</u>
Disbursements Totals:	<u>\$14,688.26</u>
Total Fee Application:	<u>\$14,688.26</u>

SECTION II.A

SUMMARY OF SERVICES

JULY 1-AUGUST 11, 2023

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.0	\$0.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	3.5	\$2,712.50
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	0.0	\$0.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	218.2	\$240,906.30
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and creditors' committee meetings.	0.0	\$0.00
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed @ 50%)	0.0	\$0.00
x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters.	0.0	\$0.00
y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) Hearings Preparation for and attendance at hearings.	0.0	\$0.00
aa) Mediation Preparation for and attendance at mediation.	0.0	\$0.00
SERVICE TOTALS:	221.7	\$243,618.50

**SECTION II.B
SUMMARY OF
ADDITIONAL SERVICES
MAY 1-MAY 31, 2023**

SERVICES RENDERED	HOURS	FEE
III) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.0	\$0.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	0.0	\$0.00
III) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	0.0	\$0.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	0.0	\$0.00
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and creditors' committee meetings.	0.0	\$0.00
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.	0.0	\$0.00
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed @ 50%)	0.0	\$0.00
x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters.	0.0	\$0.00
y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) Hearings Preparation for and attendance at hearings.	0.0	\$0.00
aa) Mediation Preparation for and attendance at mediation.	0.0	\$0.00
SERVICE TOTALS:	0.0	\$0.00

SECTION III.A
SUMMARY OF DISBURSEMENTS
JULY 1, 2023-AUGUST 11, 2023

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	\$0.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$0.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges. Court-Solutions	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$0.00
g) Outside Reproduction Services Including printing & scanning services. This includes trial preparation.	\$0.00
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) Court Reporting Transcripts.	\$0.00
j) Travel Mileage, tolls, airfare, rail fare, parking.	\$0.00
k) Courier & Express Carriers Overnight and personal delivery.	\$0.00
l) Postage	\$0.00
m) Other (specify) Professional Services BRI LLC In-House Investigative Services.	\$0.00
n) Other (specify) Trial Expenses	\$0.00
o) Other (specify) Professional Services	\$0.00
p) Other (specify) Deposition Services Paszkiewicz Court Reporting	\$0.00
q) Other (specify) Meals	\$0.00
r) Other (specify) eDiscovery Hosting In-House eDiscovery platform.	\$0.00
DISBURSEMENTS TOTAL:	\$0.00

**SECTION III.B
SUMMARY OF DISBURSEMENTS
JULY 1, 2023-AUGUST 11, 2023**

DISBURSEMENTS	AMOUNT
g) Filing Fees Payable to Clerk of Court.	\$0.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$0.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges. Court-Solutions	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$0.00
g) Outside Reproduction Services Including printing & scanning services. This includes trial preparation.	\$14,688.26
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) Court Reporting Transcripts.	\$0.00
j) Travel Mileage, tolls, airfare, rail fare, parking.	\$0.00
k) Courier & Express Carriers Overnight and personal delivery.	\$0.00
l) Postage	\$0.00
m) Other (specify) Professional Services BRI LLC In-House Investigative Services.	\$0.00
n) Other (specify) Trial Expenses	\$0.00
o) Other (specify) Professional Services	\$0.00
p) Other (specify) Deposition Services Paszkievich Court Reporting	\$0.00
q) Other (specify) Meals	\$0.00
r) Other (specify) eDiscovery Hosting In-House eDiscovery platform.	\$0.00
DISBURSEMENTS TOTAL:	\$14,688.26

I certify under penalty of perjury that the above is true.

Date: August 22, 2023

/s/ Jeffrey A. Lamken

MoloLamken LLP (“MoloLamken”) submits this Fourth Monthly & Combined Fee Statement of MoloLamken LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Appellate Litigation Counsel for The Official Committee of Talc Claimants for the Period from July 1, 2023 through August 11, 2023, and for Reimbursement of Expenses for the Period from May 1, 2023 to May 31, 2023 (“Fourth Monthly Fee Statement”), pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the “Interim Compensation Order”). The invoice summary and time entries are attached as “Exhibit A” and the time entries broken out by task is attached as “Exhibit B.”²

WHEREFORE, MoloLamken respectfully requests payment of fees and expenses for the Fourth Monthly Fee Statement in the sum of \$258,306.76, in accordance with the terms of the Interim Compensation Order.

Dated: August 22, 2023

MOLOLAMKEN LLP

*Special Appellate Litigation Counsel to the Official
Committee of Talc Claimants*

By: /s/ Jeffrey A. Lamken
Jeffrey A. Lamken

² B160 corresponds to time spent preparing fee and employment applications. L430 corresponds to time spent on litigation relating to the Committee’s motion to dismiss the Debtor’s petition, and L500 corresponds to time spent on litigation relating to appellate issues relating to the Committee’s motion to dismiss the Debtor’s petition.